

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**-against-**

**ROBERT J. MUELLER, DEEPROOT FUNDS  
LLC (a/k/a dprr Funds, LLC), AND POLICY  
SERVICES INC.,**

**Defendants,**

**-and-**

**DEEPROOT TECH LLC, DEEPROOT  
PINBALL LLC, DEEPROOT STUDIOS LLC,  
DEEPROOT SPORTS & ENTERTAINMENT  
LLC, AND DEEPROOT RE 12621 SILICON DR  
LLC,**

**Relief Defendants.**

**Civil Action No.: 5:21-cv-785-XR**

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S  
DESIGNATION OF POTENTIAL EXHIBITS**

Pursuant to the Court's Scheduling Order, ECF No. 140, Plaintiff Securities and Exchange Commission submits the below list of exhibits it expects to call and may call at the trial of this matter. This exhibit list is based upon the current status of this matter. The SEC reserves the right to supplement, correct, or clarify its list; to withdraw the designation of any exhibit; and to use an exhibit listed by the defendant. The below list includes the defendant's remaining objections after the parties met and conferred to prepare the parties' Joint Pretrial Order, ECF No. 129. The below list also includes footnotes explaining amendments and

modifications to the SEC's exhibits so the defendant may lodge additional objections if appropriate.

**SEC Exhibit List**

<b>Ex. No.</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>	<b>Defendant's Previous Objections</b>
P-1	575 Fund PPM Sept. 1, 2015	SEC-DEEPROOT-E-0014497 - 12	X		None
P-2	575 Fund PPM Sept. 1, 2015	SEC-DEEPROOT-E-0164808 - 23	X		None
P-3	575 Fund PPM Sept. 16, 2019	SEC-DEEPROOT-E-0164824 - 41	X		None
P-4	575 Fund PPM Jan. 1, 2021	SEC-DEEPROOT-E-0211514 - 30	X		None
P-5	dGRD Fund PPM Aug. 3, 2015	SEC-DEEPROOT-E-0013399 - 416	X		None
P-6	dGRD Fund PPM Aug. 3, 2015	SEC-DEEPROOT-E-0164786 - 803	X		None
P-7	dGRD Fund PPM Sept. 12, 2019	SEC-DEEPROOT-E-0164762 - 780	X		None
P-8	Operating Agreement of 575 Fund, Sept. 1, 2015	MUELLER 001067 - 88	X		None
P-9	Operating Agreement of 575 Fund, Feb. 26, 2018	DEEPROOT-E-0019790	X		None
P-10	Operating Agreement of dGRD Fund, Aug. 3, 2015	MUELLER 001045-66	X		None
P-11	Operating Agreement of dGRD Fund, Feb. 26, 2018	SEC-DEEPROOT-E-0005760	X		None
P-12	Gray Application and Subscription to 575 Fund	DEEPROOT FUNDS_002274 - 80	X		None
P-13	Withdrawn				
P-14	Withdrawn				
P-15	Withdrawn				
P-16	deeproot Organizational Charts	DEEPROOT FUNDS_006214 - 6	X		None
P-17	Investment Allocation Agreement	SEC-DEEPROOT-E-0213963 - 66	X		None
P-18	Contingent Pledge and Security Agreement	SEC-DEEPROOT-E-0213967 - 79		X	None

Ex. No.	Description	Bates Label	Will Offer	May Offer	Defendant's Previous Objections
P-19	Expert Report of Bill Post Mar. 17, 2023		X		Hearsay; improper legal opinions that invade the province of the Court; Rule 403; Rule 702
P-20	Supplemental Expert Report of Bill Post Apr. 27, 2023		X		Hearsay; improper legal opinions that invade the province of the Court; Rule 403; Rule 702
P-21	Order Authorizing and Approving the Sale of Certain Personal Property Free and Clear of All Interests Pursuant to 11 U.S.C. §§ 363(b) and (f), in the matter of <i>In re deeproot Capital Management, LLC</i> (Bkr. No. 21-51523-MMP), <i>et al.</i> , and <i>In re Policy Services, Inc.</i> (Bkr. No. 21-51513-MMP), in the United States Bankruptcy Court for the Western District of Texas.			X	Rule 403
P-22	Summary: List of Bank Accounts and Credit Cards		X		Rule 403 - Incomplete
P-23 <sup>1</sup>	Summary: Allowable Spend Compared to Actual Spend		X		Rule 403; Assumes facts not in evidence; lack of foundation

<sup>1</sup> The SEC updated Exhibits P-23, P-24, and P-25 to incorporate comments suggested by defense counsel. The SEC plans to move the admission of P-22, P-23, P-24, and P-25 as summary exhibits pursuant to Federal Rule of Evidence 1006.

Ex. No.	Description	Bates Label	Will Offer	May Offer	Defendant's Previous Objections
P-24	Summary: Fractionalized Shares of Policies Sold to Outside Investors		X		Rule 403; Assumes facts not in evidence; lack of foundation; also includes hearsay
P-25	Summary: Maturity Distribution for Policies with Fractionalized Shares Sold to Prior Investors		X		Rule 403; Assumes facts not in evidence; lack of foundation; also includes hearsay
P-26	Withdrawn				
P-27	Withdrawn				
P-28	Complaint, Dkt. 001			X	Hearsay
P-29	Answer, Dkt. 043			X	Hearsay
P-30	Mueller Responses and Objections to SEC's First Set of Interrogatories Aug. 19, 2022			X	Mueller objects to the extent that the SEC relies on any answers that included objections as the SEC has not received rulings resolving such objections
P-31	Mueller Responses and Objections to SEC's First and Second Set of Requests for Admissions Dec. 12, 2022			X	Mueller objects to the extent that the SEC relies on any answers that included objections as the SEC has not received rulings resolving such objections
P-32	Mueller Sworn Accounting	SEC-RJM-E-0000015 - 727	X		None
P-33	Mueller Expert Designations			X	None
P-34	deeproot Pinball Disclosure	DEEPROOT FUNDS_005379 - 83	X		None

Ex. No.	Description	Bates Label	Will Offer	May Offer	Defendant's Previous Objections
P-35	deeproot Funds Commercial Real Estate Allocation Disclosure	DEEPROOT FUNDS_005384 - 90	X		None
P-36	deeproot Sports & Entertainment Disclosure	DEEPROOT FUNDS_005391 - 99	X		None
P-37	Portfolio Overview	DEEPROOT FUNDS_005609 - 12	X		Rule 403
P-38	Assets Backing Up Investments Apr. 1, 2019	DEEPROOT FUNDS_005625	X		Rule 403
P-39	As simple as 123	DEEPROOT FUNDS_005627	X		None
P-40	deeproot Conference Materials - 2 Feb. 20, 2020	DEEPROOT FUNDS_005636 - 37	X		None
P-41	The deeproot Story	DEEPROOT FUNDS_005639 - 40	X		None
P-42	2017 Training Webinar <sup>2</sup>	DEEPROOT FUNDS_005641 - 53		X	None
P-43	Withdrawn				
P-44	deeproot Miscellaneous Presentations	DEEPROOT FUNDS_005660 - 707	X		None
P-45	deeproot Kauai January 2020 Conference Deck Feb. 20, 2020	DEEPROOT FUNDS_005677 - 83		X	None
P-46	deeproot Strengths & Track Record	DEEPROOT FUNDS_005708		X	None
P-47	Summer 2017 Updates	DEEPROOT FUNDS_005709 - 12		X	None
P-48	deeproot Presentation Rev. 2020-CB-3A	DEEPROOT FUNDS_005713 - 39		X	None
P-49	Mueller email to Concilla and Federico re deeproot GROWTH RUNS DEEP FUND, LLC Jan. 8, 2015	MUELLER 001441 - 1553		X	None
P-50	Texas Certificate of Filing dGRD Fund Jan. 8, 2015	MUELLER 001530		X	None
P-51	Mueller email to Concilla and Federico re deeproot 575 FUND, LLC Jan. 8, 2015	MUELLER 001554 - 1664		X	None
P-52	Texas Certificate of Filing 575 Fund LLC Jan. 8, 2015	MUELLER 001665		X	None

<sup>2</sup> When the parties originally exchanged copies of exhibits, the version of P-42 the SEC sent defendant Mueller included the wrong document. The document was correctly identified on the exhibit list. The SEC will provide defendant Mueller with an corrected copy of the exhibit.

Ex. No.	Description	Bates Label	Will Offer	May Offer	Defendant's Previous Objections
P-53	Management Discussion and Analysis of Financial Condition Feb. 10, 2015	MUELLER 001774 - 84		X	Rule 403
P-54	Mueller email to Federico and Concilla re Pinball Update May 12, 2015	MUELLER 002186 -99		X	None
P-55	Withdrawn				
P-56	Withdrawn				
P-57	Mueller email to Concilla re deeproot dGRD fund Aug. 5, 2015	MUELLER 002404		X	None
P-58	dGRD Fund PPM with tracked changes Aug. 10, 2015	MUELLER 002472 - 90		X	None
P-59	Withdrawn				
P-60	Concilla email to Mueller re dGRD - PPM Aug. 12, 2015	MUELLER 002649 - 67	X		None
P-61	Mueller email to Concilla re dGRD Aug. 12, 2015	MUELLER 002688	X		None
P-62	Mueller email to Concilla re dGRD Aug. 18, 2018	MUELLER 002705 - 06	X		None
P-63	Concilla email to Mueller re deeproot Funds Aug. 21, 2019	MUELLER 002715 - 17	X		None
P-64	Concilla email to Mueller re deeproot Sept. 1, 2015	MUELLER 002813 - 14	X		None
P-65 <sup>3</sup>	Mueller email to Concilla re Investor Presentation Sept. 24, 2015	MUELLER 002815 - 51	X		None
P-66	Withdrawn	—			
P-67	Concilla email to Mueller re Investor Presentation Sept. 24, 2015	MUELLER 002853	X		None
P-68	Withdrawn				
P-69	Withdrawn				
P-70	Mueller email to Andrew and Regan re Oct, Nov, Dec Oct. 25, 2017	CYCL003627 - 28	X		None
P-71	Withdrawn				
P-72	Andrew email to Mueller re Follow-up Apr. 1, 2018	CYCL006055 - 56	X		None

<sup>3</sup> The SEC combined P-65 and P-66. Defendant Mueller did not previously object to either exhibit.

Ex. No.	Description	Bates Label	Will Offer	May Offer	Defendant's Previous Objections
P-73	Mueller email to Andrew re deeproot Apr. 5, 2019	CYCL006121 - 22	X		None
P-74 <sup>4</sup>	Regan email to Andrew re Basha Contracts Oct. 9, 2019	CYCL006202 - 46		X	Hearsay
P-75	Shelly email to Andrew, Regan re Bash Policy Relinquishment Payment Oct. 15, 2019	CYCL006249 - 50		X	Hearsay
P-76	Withdrawn				
P-77	575 Trifold Brochure	JR000140		X	None
P-78	Spradlin email to Richardson re deeproot Sept. 5, 2018	JR000249 - 78		X	Rule 403; Hearsay
P-79	Richardson email to Spradlin re deeproot Sept. 26, 2018	JR000344 - 47		X	Rule 403; Hearsay
P-80	Spradlin email to Thompson re deeproot Sept. 27, 2018	JR000387 - 389		X	Rule 403; Hearsay
P-81	Withdrawn				
P-82	Lux Catering & Events Invoice	MLE 0141 - 45		X	None
P-83	Hagan email to Concilla, Federico and Mueller re BonusGrowth 5 Year Fund PPM Feb. 19, 2014	MUELLER-CPM 000035	X		None
P-84	Concilla email Mueller and Federico re 5 year debenture docs Feb. 20, 2014	MUELLER-CPM 000063 - 88	X		None
P-85	Concilla email to Mueller, Federico, Smith re Reg D and unqualified funds Mar. 18, 2014	MUELLER-CPM 000177 - 79	X		None
P-86	Concilla email to Mueller re the 575 Jan. 15, 2015	MUELLER-CPM 001402	X		None
P-87	Mueller email to Concilla and Federico re GRD/575 Internal Fund hypotheticals Jan. 20, 2015	MUELLER-CPM 001405		X	None
P-88	Federico email to Concilla re Catch up Feb. 5, 2015	MUELLER-CPM 001428 - 76	X		None

<sup>4</sup> The SEC previously omitted P-74 and P-75 because it appeared the parties would be able to reach a stipulation regarding the full history of the Basha insurance policy. The parties did not agree on a complete stipulation and accordingly the SEC has returned P-74 and P-75 to its exhibit list.

Ex. No.	Description	Bates Label	Will Offer	May Offer	Defendant's Previous Objections
P-89	Mueller email to Concilla re deeproot 3 Year Trending Tech Debenture Fund, LLC filings Mar. 27, 2015	MUELLER-CPM 001545 - 46	X		None
P-90	Mueller email to Concilla and Federico re 3 year tech fund Apr. 2, 2015	MUELLER-CPM 001547 - 61	X		None
P-91	Mueller email to Concilla and Federico re 3 year tech fund Apr. 7, 2015	MUELLER-CPM 001562 - 63	X		None
P-92	Withdrawn				
P-93	Mueller email to Concilla and Federico re Term Sheet - Draft v1.1 July 23, 2015	MUELLER-CPM 001706 - 10	X		None
P-94	Mueller email to Concilla re What's a good time today to conference? Aug. 4, 2015	MUELLER-CPM 001772 - 90	X		None
P-95	Withdrawn				
P-96	Withdrawn				
P-97	Federico email to Mueller and Concilla re Form D Amendment Filing for the dGRD Aug. 9, 2016	MUELLER-CPM 002351	X		None
P-98	Spradlin Memo May 27, 2020	MUELLER-CPM 002857 - 58		X	None
P-99	deeproot Investor Presentation Sept. 24, 2015	MUELLER-CPM 004398 - 432	X		None
P-100	Trifold Draft with Markup Mar. 10, 2023	MUELLER-CPM 006165 - 69		X	None
P-101	Mueller Background Questionnaire	SEC_RJM-E-0000001 - 14		X	Rule 403
P-102 <sup>5</sup>	Withdrawn				
P-103	Ownership Transfer Agreement	SEC-AAC-E-0000227 - 40		X	None
P-104	Slack Message from Scott Allen	SA-14-15		X	None
P-105	Allen Letter to Mueller Oct. 7, 2020	SEC-AllenS-E-000081	X		None
P-106 <sup>6</sup>	Withdrawn				

<sup>5</sup> The SEC's position is that the document previously marked as P-102 was excluded by the court's rulings on the parties' motions *in limine*. If the court later allows evidence regarding the subject matter of this exhibit, the SEC may seek leave to present P-102 at trial.



Ex. No.	Description	Bates Label	Will Offer	May Offer	Defendant's Previous Objections
P-107	deeproot August Bonus Agreement Sept. 9, 2019	SEC-AllenS-E-000037	X		None
P-108	Scott Allen Memo May 27, 2020	SEC-AllenS-E-000046-51	X		None
P-109	Big Picture Discussion List	SEC-AllenS-E-000009-14	X		None
P-110	Receipt: Americus Diamond Dec. 14, 2015	SEC-AMERICUS-E-0000005	X		None
P-111	Receipt: Americus Diamond Dec. 15, 2018	SEC-AMERICUS-E-0000012	X		None
P-112	Cooper email to deeproot re August 22, 2020 Letter Sept. 4, 2020	SEC-DEEPROOT-E-0004997 - 99		X	None
P-113	Muller letter to 575P Investors Sept. 30, 2020	SEC-DEEPROOT-E-0008354	X		None
P-114	Quick FAQ	SEC-DEEPROOT-E-0011222	X		None
P-115	deeproot email re deeproot Pinball Launch Date & Incentive Aug. 27, 2020	SEC-DEEPROOT-E-0013075 - 77	X		None
P-116	Portfolio Narrative Cover email Mar. 5, 2020	SEC-DEEPROOT-E-0013221	X		None
P-117	deeproot Family of Companies Investment Portfolio Narrative 2020.B2	SEC-DEEPROOT-E-0013223 - 36	X		None
P-118	Gibbs Disclosure Dec. 1, 2015	SEC-DEEPROOT-E-0016060		X	None
P-119	Mueller letter to Kirkman July 9, 2019	SEC-DEEPROOT-E-0017557		X	None
P-120	Mueller email to Dandridge re deeproot Funds November Updates Nov. 10, 2020	SEC-DEEPROOT-E-0025419	X		None
P-121	Fact Right Report, 575 Fund October 15, 2019	SEC-DEEPROOT-E-0031095 - 121		X	Best Evidence is FR1001 - 1003
P-122	Cary Mueller email to Mueller re proxy Feb. 2, 2017	SEC-DEEPROOT-E-0037279 - 82	X		None

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<sup>6</sup> The SEC's position is that the document previously marked as P-106 was excluded by the court's rulings on the parties' motions *in limine*. If the court later allows evidence regarding the subject matter of this exhibit, the SEC may seek leave to present P-106 at trial.

Ex. No.	Description	Bates Label	Will Offer	May Offer	Defendant's Previous Objections
P-123	the 575 Allocation Acknowledgement	SEC-DEEPROOT-E-0061786 - 87	X		None
P-124 <sup>7</sup>	575 Fund Client Letter Sept. 30, 2020	SEC-DEEPROOT-E-0008354	X		None
P-125	Mueller email to Andrew re Policies Apr. 2, 2019	SEC-DEEPROOT-E-0088710 - 11	X		None
P-126	Presentations and Materials Dec. 29, 2020	SEC-DEEPROOT-E-0093397 - 99	X		None
P-127	Premier Global Corp. Factoring Service Agreement	SEC-DEEPROOT-E-0186463-71		X	Rule 403
P-128 <sup>8</sup>	Withdrawn				
P-129	Withdrawn				
P-130	Withdrawn				
P-131 <sup>9</sup>	Wik email to Mueller re Updated Files Mar. 20, 2017	SEC-DEEPROOT-E-0210796 - 808	X		None
P-132	Mueller email to Turner including Presentations and Brochures Apr. 6, 2016	SEC-DEEPROOT-E-0211326 - 52		X	None
P-133 <sup>10</sup>	Mueller email to Wik re Updated Files Mar. 18, 2017	SEC-DEEPROOT-E-0226591 - 93		X	None
P-134	Withdrawn				
P-135	Withdrawn				
P-136	Mueller email to Regan and Andrew re Updated Presentations June 8, 2017	SEC-DEEPROOT-E-0226740 - 82	X		None
P-137	Allen email to Mueller re Deeproot Fund 575P Investment of \$133,000 by Andrew W. Cheronas Oct. 6, 2020	SEC-DEEPROOT-E-0126910-13		X	None

<sup>7</sup> When the parties originally exchanged copies of exhibits, the version of P-124 the SEC sent defendant Mueller included the wrong document. The document was correctly identified on the exhibit list. The SEC will provide defendant Mueller with an corrected copy of the exhibit.

<sup>8</sup> The SEC's position is that the documents previously marked as P-128, P-129, and P-130 were excluded by the court's rulings on the parties' motions *in limine*. If the court later allows evidence regarding the subject matter of these exhibits, the SEC may seek leave to present P-128, P-129, and P-130 at trial.

<sup>9</sup> P-131 is an email. The SEC has amended P-131 to add the document attached to the email.

<sup>10</sup> The SEC combined P-133, an email, with P-134 and P-135, the documents attached to the email. Defendant Mueller did not previously object to the exhibits when they were separately marked.

Ex. No.	Description	Bates Label	Will Offer	May Offer	Defendant's Previous Objections
P-138	Disney Payment History	SEC-DISNEY-E-0000177 - 79	X		None
P-139	Disney Cruise Receipts 2016	SEC-DISNEY-E-0000001 - 27	X		None
P-140	Disney Cruise Receipts 2017	SEC-DISNEY-E-0000051 - 117	X		None
P-141	Disney Cruise Receipts 2018	SEC-DISNEY-E-0000118 - 173	X		None
P-142	Withdrawn				
P-143	Withdrawn				
P-144	Withdrawn				
P-145	Withdrawn				
P-146	Withdrawn				
P-147	Withdrawn				
P-148	Sub-Sublease Agreement Mar. 2019	SEC-EMAILS-E-0011648 - 56		X	None
P-149	Tabora Gallery Receipt Jan. 12, 2017	SEC-EMAILS-E-0016479	X		None
P-150	Tabora Gallery Invoice and Receipts Jan. 12, 2017	SEC-EMAILS-E-0016515 - 16	X		None
P-151	Tabora Gallery Receipt Aug. 9, 2018	SEC-EMAILS-E-0016501 - 03	X		None
P-152	Photo from Tabora Gallery	SEC-EMAILS-E-0016473	X		None
P-153	SDV October 2020 Statement	SEC-EMAILS-E-0017226		X	None
P-154	SDV March 2021 Statement	SEC-EMAILS-E-0017232 - 33		X	None
P-155	SDV Lease	SEC-EMAILS-E-0017234 - 67		X	None
P-156	Allen Resume	SEC-EMAILS-E-0018789		X	None
P-157	deeproot Pinball Balance Sheet Dec. 31, 2015	SEC-FTI-E-0000010		X	None
P-158	deeproot Pinball Balance Sheet Dec. 31 2016	SEC-FTI-E-0000011		X	None
P-159	deeproot Pinball Balance Sheet Dec. 31, 2017	SEC-FTI-E-0000012		X	None
P-160	deeproot Pinball Balance Sheet Dec. 31, 2018	SEC-FTI-E-0000013		X	None
P-161	deeproot Pinball Balance Sheet Dec. 31, 2019	SEC-FTI-E-0000014		X	None
P-162	deeproot Pinball Balance Sheet Dec. 31 2020	SEC-FTI-E-0000015		X	None
P-163	deeproot Pinball Balance Sheet Oct 14, 2021	SEC-FTI-E-0000016		X	None
P-164	deeproot Pinball General Ledger Sept. 24 - Oct. 14, 2021	SEC-FTI-E-0000017 - 20		X	None

<b>Ex. No.</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>	<b>Defendant's Previous Objections</b>
P-165	deeproot Pinball Profit Loss Jan. 1 - Dec. 31, 2016	SEC-FTI-E-0000021		X	None
P-166	deeproot Pinball Profit Loss Jan. 1 - Dec. 31, 2017	SEC-FTI-E-0000022		X	None
P-167	deeproot Pinball Profit Loss Jan. 1 - Dec. 31, 2018	SEC-FTI-E-0000023		X	None
P-168	deeproot Pinball Profit Loss Jan. 1 - Dec. 31, 2019	SEC-FTI-E-0000024		X	None
P-169	deeproot Pinball Profit Loss Jan. 1 - Dec. 31, 2020	SEC-FTI-E-0000025		X	None
P-170	deeproot Pinball Profit Loss Jan. 1 - Oct. 14, 2021	SEC-FTI-E-0000026		X	None
P-171	deeproot Pinball Profit Loss Sept. 24 - Dec. 31, 2015	SEC-FTI-E-0000027		X	None
P-172	deeproot Pinball Trial Balance Dec. 31, 2016	SEC-FTI-E-0000028		X	None
P-173	deeproot Pinball Trial Balance Dec. 31, 2017	SEC-FTI-E-0000029		X	None
P-174	deeproot Pinball Trial Balance Dec. 31, 2018	SEC-FTI-E-0000030		X	None
P-175	deeproot Pinball Trial Balance Dec. 31, 2019	SEC-FTI-E-0000031		X	None
P-176	deeproot Pinball Trial Balance Dec. 31, 2020	SEC-FTI-E-0000032		X	None
P-177	deeproot Pinball Trial Balance Oct. 14, 2021	SEC-FTI-E-0000033		X	None
P-178	deeproot Pinball Trial Balance Sept. 24 - Dec. 31, 2015	SEC-FTI-E-0000034		X	None
P-179	deeproot Funds Balance Sheet Dec. 31, 2018	SEC-FTI-E-0000052 - 55		X	None
P-180	deeproot Funds Balance Sheet Dec. 31, 2015	SEC-FTI-E-0000044 - 45		X	None
P-181	deeproot Funds Balance Sheet Dec. 31, 2016	SEC-FTI-E-0000046 - 48		X	None
P-182	deeproot Funds Balance Sheet Dec. 31, 2017	SEC-FTI-E-0000049 - 51		X	None
P-183	deeproot Funds Balance Sheet Dec. 31, 2019	SEC-FTI-E-0000056 - 61		X	None
P-184	deeproot Funds Balance Sheet Dec. 31, 2020	SEC-FTI-E-0000062 - 67		X	None
P-185	deeproot Funds Balance Sheet Oct. 14, 2021	SEC-FTI-E-0000068 - 73		X	None
P-186	deeproot Funds Balance Sheet Oct. 14, 2021	SEC-FTI-E-0000074 - 182		X	None
P-187	deeproot Funds Profit Loss Jan. 1 - Dec. 31, 2016	SEC-FTI-E-0000183		X	None

Ex. No.	Description	Bates Label	Will Offer	May Offer	Defendant's Previous Objections
P-188	deeproot Funds Profit Loss Jan. 1 - Dec. 31, 2017	SEC-FTI-E-0000184		X	None
P-189	deeproot Funds Profit Loss Jan. 1 - Dec. 31, 2018	SEC-FTI-E-0000185		X	None
P-190	deeproot Funds Profit Loss Jan. 1 - Dec. 31, 2019	SEC-FTI-E-0000186		X	None
P-191	deeproot Funds Profit Loss Jan. 1 - Dec. 31, 2020	SEC-FTI-E-0000187		X	None
P-192	deeproot Funds Profit Loss Jan. 1, 2021 - Oct. 14, 2021	SEC-FTI-E-0000188		X	None
P-193	deeproot Funds Profit Loss Sept. 24, 2015 - Oct. 14, 2021	SEC-FTI-E-0000189		X	None
P-194	deeproot Funds Trial Balance Dec. 31, 2015	SEC-FTI-E-0000190		X	None
P-195	deeproot Funds Trial Balance Dec. 31, 2016	SEC-FTI-E-0000191 - 92		X	None
P-196	deeproot Funds Trial Balance Dec. 31, 2017	SEC-FTI-E-0000193 - 95		X	None
P-197	deeproot Funds Trial Balance Dec. 31, 2018	SEC-FTI-E-0000196 - 99		X	None
P-198	deeproot Funds Trial Balance Dec. 31, 2019	SEC-FTI-E-0000200 - 05		X	None
P-199	deeproot Funds Trial Balance Dec. 31, 2020	SEC-FTI-E-0000206 - 11		X	None
P-200	deeproot Funds Trial Balance Oct. 14, 2021	SEC-FTI-E-0000212 - 17		X	None
P-201	deeproot Studios Balance Sheet Dec. 31 2015	SEC-FTI-E-0000218		X	None
P-202	deeproot Studios Balance Sheet Dec. 31, 2016	SEC-FTI-E-0000219		X	None
P-203	deeproot Studios Balance Sheet Dec. 31, 2017	SEC-FTI-E-0000220		X	None
P-204	deeproot Studios Balance Sheet Dec. 31, 2018	SEC-FTI-E-0000221		X	None
P-205	deeproot Studios Balance Sheet Dec. 31, 2019	SEC-FTI-E-0000222		X	None
P-206	deeproot Studios Balance Sheet Dec. 31, 2020	SEC-FTI-E-0000223		X	None
P-207	deeproot Studios Balance Sheet Oct. 14, 2021	SEC-FTI-E-0000224		X	None
P-208	deeproot Studios General Ledger Sept. 24, 2015 - Oct. 14, 2021	SEC-FTI-E-0000225 - 34		X	None
P-209	deeproot Studios Profit Loss Jan. 1 - Dec. 31, 2016	SEC-FTI-E-0000235		X	None

<b>Ex. No.</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>	<b>Defendant's Previous Objections</b>
P-210	deeproot Studios Profit Loss Jan. 1 - Dec. 31, 2017	SEC-FTI-E-0000236		X	None
P-211	deeproot Studios Profit Loss Jan. 1 - Dec. 31, 2018	SEC-FTI-E-0000237		X	None
P-212	deeproot Studios Profit Loss Jan. 1 - Dec. 31, 2019	SEC-FTI-E-0000238		X	None
P-213	deeproot Studios Profit Loss Jan. 1 - Dec. 31, 2020	SEC-FTI-E-0000239		X	None
P-214	deeproot Studios Profit Loss Jan. 1 - Oct. 14, 2021	SEC-FTI-E-0000240		X	None
P-215	deeproot Studios Profit Loss Sept. 24, 2015 - Oct. 14, 2021	SEC-FTI-E-0000241		X	None
P-216	deeproot Studios Trial Balance Dec. 31, 2016.	SEC-FTI-E-0000242		X	None
P-217	deeproot Studios Trial Balance Dec. 31 2017	SEC-FTI-E-0000243		X	None
P-218	deeproot Studios Trial Balance Dec. 31, 2018	SEC-FTI-E-0000244		X	None
P-219	deeproot Studios Trial Balance Dec. 31, 2019	SEC-FTI-E-0000245		X	None
P-220	deeproot Studios Trial Balance Dec. 31, 2020	SEC-FTI-E-0000246		X	None
P-221	deeproot Studios Trial Balance Oct. 14, 2021	SEC-FTI-E-0000247		X	None
P-222	deeproot Studios Trial Balance Sept. 24, 2015 - Dec. 31, 2015	SEC-FTI-E-0000248		X	None
P-223	Deeproot Tech Balance Sheet Dec. 31, 2015	SEC-FTI-E-0000249		X	None
P-224	Deeproot Tech Balance Sheet Dec. 31, 2016	SEC-FTI-E-0000250		X	None
P-225	Deeproot Tech Balance Sheet Dec. 31, 2017	SEC-FTI-E-0000251		X	None
P-226	Deeproot Tech Balance Sheet Dec. 31, 2018	SEC-FTI-E-0000252		X	None
P-227	Deeproot Tech Balance Sheet Dec. 31, 2019	SEC-FTI-E-0000253		X	None
P-228	Deeproot Tech Balance Sheet Dec. 31, 2020	SEC-FTI-E-0000254		X	None
P-229	Deeproot Tech Balance Sheet Oct. 14, 2021	SEC-FTI-E-0000255		X	None
P-230	deeproot Tech LLC - General Ledger Sept 24, 2015 – Oct. 14, 2021	SEC-FTI-E-0000256 - 362		X	None
P-231	Deeproot Tech Profit Loss Jan. 1 - Dec. 31, 2016	SEC-FTI-E-0000363		X	None

<b>Ex. No.</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>	<b>Defendant's Previous Objections</b>
P-232	Deeproot Tech Profit Loss Jan. 1 - Dec. 31, 2017	SEC-FTI-E-0000364		X	None
P-233	Deeproot Tech Profit Loss Jan. 1 - Dec. 31, 2018	SEC-FTI-E-0000365		X	None
P-234	Deeproot Tech Profit Loss Jan. 1 - Dec. 31, 2019	SEC-FTI-E-0000366		X	None
P-235	Deeproot Tech Profit Loss Jan. 1 - Dec. 31, 2020	SEC-FTI-E-0000367		X	None
P-236	Deeproot Tech Profit Loss Jan. 1 - Oct. 14, 2021	SEC-FTI-E-0000368		X	None
P-237	Deeproot Tech Profit Loss Sept. 24 - Dec. 31, 2015	SEC-FTI-E-0000369		X	None
P-238	Deeproot Tech Trial Balance Dec. 31, 2016	SEC-FTI-E-0000370		X	None
P-239	deeproot Tech Trial Balance Dec. 31, 2017	SEC-FTI-E-0000371		X	None
P-240	deeproot Tech Trial Balance Dec. 31, 2018	SEC-FTI-E-0000372		X	None
P-241	deeproot Tech Trial Balance Dec. 31, 2019	SEC-FTI-E-0000373		X	None
P-242	deeproot Tech Trial Balance Dec. 31, 2020	SEC-FTI-E-0000374		X	None
P-243	deeproot Tech Trial Balance Oct. 14, 2021	SEC-FTI-E-0000375		X	None
P-244	Policy Services Balance Sheet Dec. 31, 2015	SEC-FTI-E-0000385 - 90		X	None
P-245	Policy Services Balance Sheet Dec. 31, 2016	SEC-FTI-E-0000391 - 96		X	None
P-246	Policy Services Balance Sheet Dec. 31, 2017	SEC-FTI-E-0000397 - 401		X	None
P-247	Policy Services Balance Sheet Dec. 31, 2018	SEC-FTI-E-0000402 - 06		X	None
P-248	Policy Services Balance Sheet Dec. 31, 2019	SEC-FTI-E-0000407 - 11		X	None
P-249	Policy Services Balance Sheet Dec. 31, 2020	SEC-FTI-E-0000412 - 16		X	None
P-250	Policy Services Balance Sheet Oct. 14, 2021	SEC-FTI-E-0000417 - 21		X	None
P-251	Policy Services General Ledger Sept. 24, 2015 - Oct. 14, 2021	SEC-FTI-E-0000422 - 535		X	None
P-252	Policy Services Profit Loss Jan. 1 - Dec. 31, 2016	SEC-FTI-E-0000536 - 37		X	None
P-253	Policy Services Profit Loss Jan. 1 - Dec. 31, 2017	SEC-FTI-E-0000538 - 39		X	None
P-254	Policy Services Profit Loss Jan. 1 - Dec. 31, 2018	SEC-FTI-E-0000540 - 41		X	None

Ex. No.	Description	Bates Label	Will Offer	May Offer	Defendant's Previous Objections
P-255	Policy Services Profit Loss Jan. 1 - Dec. 31, 2019	SEC-FTI-E-0000542		X	None
P-256	Policy Services Profit Loss Jan. 1 - Dec. 31, 2020	SEC-FTI-E-0000543		X	None
P-257	Policy Services Profit Loss Jan. 1 - Oct. 14, 2021	SEC-FTI-E-0000544		X	None
P-258	Policy Services Profit Loss Sept. 24, 2015 - Dec. 31, 2015	SEC-FTI-E-0000545		X	None
P-259	Policy Services Trial Balance Dec. 31, 2016	SEC-FTI-E-0000546 - 50		X	None
P-260	Policy Services Trial Balance Dec. 31, 2017	SEC-FTI-E-0000551 - 55		X	None
P-261	Policy Services Trial Balance Dec. 31, 2018	SEC-FTI-E-0000556 - 60		X	None
P-262	Policy Services Trial Balance Dec. 31, 2019	SEC-FTI-E-0000561 - 65		X	None
P-263	Policy Services Trial Balance Dec. 31, 2020	SEC-FTI-E-0000566 - 70		X	None
P-264	Policy Services Trial Balance Jan. 1 - Oct. 14, 2021	SEC-FTI-E-0000571 - 74		X	None
P-265	Policy Services Trial Balance Sept. 14 - Dec. 31, 2015	SEC-FTI-E-0000575 - 78		X	None
P-266	Kauai Vacation Rental Declaration	SEC-KVRRE-E-0000013		X	None
P-267	Kauai Vacation Rental Owner Statement June 30, 2017	SEC-KVRRE-E-0000014 - 15	X		None
P-268	Mueller Wire Receipt re 4330 Kauai Beach Dr. Nov. 14, 2016	SEC-ORTC-E-0000361 - 62		X	None
P-269	Mueller Wire Receipt re 4330 Kauai Beach Dr. Nov. 15, 2016	SEC-ORTC-E-0000363 - 64	X		None
P-270	Mueller Wire Receipt re 4330 Kauai Beach Dr. Nov. 2, 2016	SEC-ORTC-E-0000365 - 66		X	None
P-271	Final Settlement Statement Nov. 28, 2016	SEC-ORTC-E-0000410	X		None
P-272	Concilla email to Mueller attaching engagement letter Apr. 22, 2013	SEC-PulmanR-E-0000001, 04 - 05	X		None
P-273	Concilla email to Mueller re Follow up to Conference Call Apr. 22, 2013	SEC-PulmanR-E-0000013 - 17	X		None
P-274	Life Settlement Certificates	SEC-PulmanR-E-0000245 - 1038		X	None



Ex. No.	Description	Bates Label	Will Offer	May Offer	Defendant's Previous Objections
P-275	Life Settlement Certificate, TX120034, Aug 9, 2012	SEC-PulmanR-E-0000819 - 22	X		None
P-276	Life Settlement Certificate, CA120009, Oct. 1, 2014	SEC-PulmanR-E-0000868 - 77	X		None
P-277	AMEX Cancellation Letter to Mueller June 22, 2019	SEC-RFPA-AMEX-E-0001731	X		Rule 403
P-278	x32003 AMEX Statement July 16, 2019	SEC-RFPA-AMEX-E-0002620 - 27	X		Rule 403
P-279	x41003 AMEX Statement July 19, 2019	SEC-RFPA-AMEX-E-0002067 - 69	X		Rule 403
P-280	x51001 AMEX Statement July 9, 2019	SEC-RFPA-AMEX-E-0003373 - 75	X		None
P-281	Amex Statement x51001 May 9, 2016	SEC-RFPA-AMEX-E-0002851 - 57	X		None
P-282	Amex Statement x51001 Aug. 9, 2016	SEC-RFPA-AMEX-E-0002927 - 49	X		None
P-283	Amex Statement x51001 Mar. 9, 2017	SEC-RFPA-AMEX-E-0003067 - 79	X		None
P-284	Amex Statement x51001 Apr. 17, 2017	SEC-RFPA-AMEX-E-0003081 - 89	X		None
P-285	Amex Statement x51001 July 9, 2018	SEC-RFPA-AMEX-E-0003255 - 62	X		None
P-286	Amex Statement x51001 Apr. 8, 2019	SEC-RFPA-AMEX-E-0003351 - 59	X		None
P-287	x51001 Amex Statements	SEC-RFPA-AMEX-E-0002631 - 3375		X	None
P-288	x51001 Amex Payments	SEC-RFPA-AMEX-E-0001618 - 19		X	None
P-289	Amex Statement x51001 Mar. 9, 2016	SEC-RFPA-AMEX-E-0002809 - 29	X		None
P-290	x2385 Wells Fargo Wire Full Transaction Report Aug. 14, 2019	SEC-RFPA-WFB-E-0005707	X		None
P-291	x2385 Wells Fargo Wire Full Transaction Report Oct. 2, 2019	SEC-RFPA-WFB-E-0005736	X		None
P-292	x2385 Wells Fargo Statements May to July 2020	SEC-RFPA-WFP-E-0003761 - 4046		X	None
P-293	x2385 Wells Fargo Statements May 2020 to Feb. 2021	SEC-RFPA-WFP-E-0004610 - 35		X	None
P-294	x2385 Wells Fargo Statements June to Aug. 2021	SEC-DEEPROOT-E-0231718 - 24, 30-34		X	None
P-295	x2385 Wells Fargo Deposits May 2015 to July 2020	SEC-RFPA-WFP-E-0003616 - 745		X	None

Ex. No.	Description	Bates Label	Will Offer	May Offer	Defendant's Previous Objections
P-296	x2385 Wells Fargo Deposits July 2020 to Feb. 2021	SEC-RFPA-WFB-E-0004559 - 69		X	None
P-297	x2385 Wells Fargo Wires Jan. 2014 to May 7, 2021	SEC-RFPA-WFB-E-0005387 - 914		X	None
P-298	x2534 Wells Fargo Muller Withdrawal Slip for \$100k Aug. 10, 2017	SEC-RFPA-WFB-E-0003535	X		Rule 403
P-299	x2534 Wells Fargo deeproot Funds Check 2356 to Kauai Vacation Rentals Mar. 3, 2017	SEC-RFPA-WFB-E-0003542	X		None
P-300	x2534 Wells Fargo Statements Apr. 15, 2015 to July 13, 2020	SEC-RFPA-WFB-E-0004047 - 275		X	None
P-301	x2534 Wells Fargo Statements July 13, 2020 to Mar. 11, 2021	SEC-RFPA-WFB-E-0005226 - 261		X	None
P-302	x2534 Wells Fargo Statements May 2021 to Aug. 2021	SEC-CORR-E-0000318 - 297		X	None
P-303	x2534 Wells Fargo Check Nov. 2020	SEC-RFPA-WFB-E-0005184		X	None
P-304	x2534 Wells Fargo Deposits May 2015 to July 2020	SEC-RFPA-WFB-E-0003746 - 49		X	None
P-305	x2534 Wells Fargo Checks/Debits May 2015 to July 2020	SEC-RFPA-WFB-E-0003495 - 615		X	None
P-306	x2534 Wells Fargo Wire May 19, 2014	SEC-RFPA-WFB-E-0005915		X	None
P-307	x2385 and x2534 Wells Fargo Signature Cards	SEC-RFPA-WFB-E-0003754 - 60		X	None
P-308	x3081 Wells Fargo Wires	SEC-RFPA-WFB-E-0005916 - 19		X	None
P-309	x3081 x3099 Wells Fargo Signature Card	SEC-RFPA-WFB-E-0001944 - 1948		X	None
P-310	x3081 Wells Fargo Statements May 2015 to July 2020	SEC-RFPA-WFB-E-0002175 - 2405		X	None
P-311	x3081 Wells Fargo Statements May 2021 to Aug. 2021	SEC-CORR-E-0000212 -15, 326-29, 205 - 08		X	None
P-312	x3081 Wells Fargo Statements July 2020 to Jan. 2021	SEC-RFPA-WFB-E-0004636 - 65		X	None
P-313	x3081 Wells Fargo Deposits July 2020 to Feb. 2021	SEC-RFPA-WFB-E-0004570 - 75		X	None

Ex. No.	Description	Bates Label	Will Offer	May Offer	Defendant's Previous Objections
P-314	x3099 Wells Fargo Statements May 2021 to Aug. 2021	SEC-CORR-E-0000334 - 354		X	None
P-315	x5571 Wells Fargo Sig Card	SEC-RFPA-WFB-E-0004580 - 83		X	None
P-316	x5571 Wells Fargo Statements Feb. 2019 to Feb. 2021	SEC-RFPA-WFB-E-0005262 - 5365		X	None
P-317	x5571 Wells Fargo Statements May 2015 to Feb. 2021	SEC-RFPA-WFB-E-0004697 - 4951		X	None
P-318	x5571 Wells Fargo Statements May 2021 to Aug. 2021	SEC-CORR-E-0000270 - 73, 302 - 05, 245 - 249		X	None
P-319	x5571 Wells Fargo Wires	SEC-RFPA-WFB-E-0005173 - 75		X	None
P-320	x5571 Wells Fargo Wires	SEC-RFPA-WFB-E-0005924 - 28		X	None
P-321	x6415 Wells Fargo Signature Card	SEC-RFPA-WFB-E-0005222 - 25		X	None
P-322	x6415 Wells Fargo Statements May 2021 to Aug. 2021	SEC-DEEPROOT-E-0231746 - 49, 42 - 45, 37		X	None
P-323	x6575 Wells Fargo Sig Card	SEC-RFPA-WFB-E-0001963 - 66		X	None
P-324	x6575 Wells Fargo Statements Mar. 2017 to July 2020	SEC-RFPA-WFB-E-0002629 - 2807		X	None
P-325	x6575 Wells Fargo Statements May 2021 to Aug. 2021	SEC-DEEPROOT-E-0231738 - 41, 13 - 17, 25 - 28, 36		X	None
P-326	x6575 Wells Fargo Checks May 2017 to July 2020	SEC-RFPA-WFB-E-0001536 - 650		X	None
P-327	x6575 Wells Fargo Checks July 2020 to Feb. 2021	SEC-RFPA-WFB-E-0004521 - 30		X	None
P-328	x6575 Wells Fargo Deposits Mar. 2017 to July 2020	SEC-RFPA-WFB-E-0001847 - 60		X	None
P-329	x6575 Wells Fargo Wires	SEC-RFPA-WFB-E-0005929 - 5960		X	None
P-330	x8461 x8487 Wells Fargo Signature Card	SEC-RFPA-WFB-E-0001938 - 1943		X	None
P-331	x8461 Wells Fargo Statements May 2015 to July 2020	SEC-RFPA-WFB-E-0002808 - 3094		X	None
P-332	x8461 Wells Fargo Statements May 2021 to Aug. 2021	SEC-RFPA-WFB-E-0231755 - 59, 50 - 53, 35		X	None

Ex. No.	Description	Bates Label	Will Offer	May Offer	Defendant's Previous Objections
P-333	x8461 Wells Fargo Checks May 2015 to July 2020	SEC-RFPA-WFB-E-0001651 - 1828		X	None
P-334	x8461 Wells Fargo Checks July 2020 to Feb. 2021	SEC-RFPA-WFB-E-0004531 - 4558		X	None
P-335	x8461 Wells Fargo Deposits May 2015 to July 2020	SEC-RFPA-WFB-E-0001861 - 1927		X	None
P-336	x8461 Wells Fargo Wires	SEC-RFPA-WFB-E-0005961 - 64		X	None
P-337	x8487 Wells Fargo Wire Full Transaction Report Nov. 15, 2016	SEC-RFPA-WFB-E-0006003	X		None
P-338	x8487 Wells Fargo Wire Full Transaction Report Aug. 10, 2018	SEC-RFPA-WFB-E-0006045	X		None
P-339	x8487 Wells Fargo Statements May 2015 to July 2020	SEC-RFPA-WFB-E-0003095 - 3270		X	None
P-340	x8487 Wells Fargo Statements July 2020 to Feb. 2021	SEC-RFPA-WFB-E-0005022 - 37		X	None
P-341	x8487 Wells Fargo Statements May 2021 to Aug. 2021	SEC-CORR-E-0000209 - 221		X	None
P-342	x8487 Wells Fargo Deposits May 2015 to July 2020	SEC-RFPA-WFB-E-0001928 - 35		X	None
P-343	x8487 Wells Fargo Wires	SEC-RFPA-WFB-E-0005965 - 6086		X	None
P-344	x5571 Wells Fargo Deposits Feb. 2019 to Feb. 2021	SEC-RFPA-WFB-E-0005185 - 212		X	None
P-345	Withdrawn				
P-346	Withdrawn				
P-347 <sup>11</sup>	Withdrawn				
P-348	Withdrawn				
P-349	Withdrawn				
P-350	deeproot Portal - Investors	SEC-SEC-E-0003162 - 3261		X	None
P-351	deeproot Portal - Policies Services - Closed Policies	SEC-SEC-E-0003262		X	None
P-352	deeproot Portal - Policies Services - Open Policies	SEC-SEC-E-0003265		X	None

<sup>11</sup> The SEC's position is that the document previously marked as P-347 was excluded by the court's rulings on the parties' motions *in limine*. If the court later allows evidence regarding the subject matter of this exhibits, the SEC may seek leave to present P-347 at trial.

Ex. No.	Description	Bates Label	Will Offer	May Offer	Defendant's Previous Objections
P-353	Leon Declaration Sept. 14, 2022	SEC-SEC-E-0002496		X	Hearsay; conclusory; lack of foundation; assumes facts not in evidence; Rule 702; improper legal conclusion; Rule 403
P-354	Gray Declaration Oct. 9, 2022	SEC-SEC-E-0002959		X	Hearsay; conclusory; lack of foundation; assumes facts not in evidence; Rule 702; improper legal conclusion; Rule 403
P-355	Saint Mary's Hall Declaration	SEC-SMH-E-0000111		X	None
P-356	Saint Mary's Hall Transaction Records	SEC-SMH-E-0000026 - 52, 55-57, 59	X		None
P-357	Spradlin Memo to Mueller June 11, 2022	SEC-SpradlinN-E-0000123	X		None
P-358	Spradlin Resignation Letter July 9, 2020	SEC-SpradlinN-E-0000124	X		None
P-359	Spradlin Resume	SPRADLIN0001 - 02		X	None
P-360	x4336 x6407 x7059 USAA Records Feb. 2014 to Feb. 2021	SEC-USAA-E-0000030 - 1027		X	None
P-361	Amex Statement x51001 Sept. 7, 2018	SEC-RFPA-AMEX-E-0003273 - 82		X	None
P-362	Amex Statement x51001 Apr. 8, 2016	SEC-RFPA-AMEX-E-0002831 - 49		X	None
P-363	Robert Mueller Employee Earning Record	SEC-PAYCHEX-E-0000220 - 32		X	None
P-364	Summary: Investments in 575 Fund and dGRD Fund		X		None

Ex. No.	Description	Bates Label	Will Offer	May Offer	Defendant's Previous Objections
P-365	Summary: Insurance Policies Purchased by Policy Services		X		None
P-366	Summary: Payments to Investors		X		Rule 403; see <i>Motion in Limine</i> <sup>12</sup>
P-367 <sup>13</sup>	Summary: Payment of Mueller's Personal Expenses		X		Rule 403; see <i>Motion in Limine</i>
P-368	Summary: Robert Mueller Compensation		X		Rule 403; see <i>Motion in Limine</i>
P-369	Secured Promissory Notes for Basha Policy, Nov. 1, 2018	SEC-DEEPROOT-E-0222177 - 83		X	None
P-370	Policy Relinquishment and Loan Satisfaction Agreement for Basha Policy, Apr. 8, 2019	SEC-DEEPROOT-E-0104324 - 34		X	None
P-371	Factright, 575 Fund Report, Mar. 1, 2018	SEC-FACTRIGHT-E-0000530-57		X	None
P-372	Factright, dGRD Fund Report, Mar. 1, 2018	SEC-FACTRIGHT-E-0000558-86		X	None
P-373	Factright, 575 Fund Report, Oct. 25, 2019	SEC-FACTRIGHT-E-0000587-615		X	None
P-374	Factright, dGRD Fund Report, Oct. 25, 2019	SEC-FACTRIGHT-E-0000616-644		X	None
P-375	Amended Answer, Dkt. No. 75			X	Hearsay
P-376	Gray Ownership Certificates	DEEPROOT FUNDS_002271-22	X		Exhibit provided to defense 11/22/23
P-377	Gray Welcome Letter		X		Exhibit provided to defense 11/22/23
P-378	Gray Subscription Agreement and other documents	DEEPROOT FUNDS_002274-336	X		Exhibit provided to defense 11/22/23

<sup>12</sup> The court denied defendant's motion *in limine*. See Text Order dated Nov. 28, 2023.

<sup>13</sup> The SEC updated Exhibits P-367 and P-368 to incorporate comments suggested by defense counsel. The SEC plans to move the admission of P-364, P-365, P-366, P-367, and P-368 as summary exhibits pursuant to Federal Rule of Evidence 1006.

<b>Ex. No.</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>	<b>Defendant's Previous Objections</b>
P-379 <sup>14</sup>	Jennings dGRD Application, May 4, 2016	SEC-FHC-E-002211-16	X		
P-380	Jennings 575 Application and Subscription Agreement, June 2, 2016	DEEPROOT FUNDS_003012-20	X		
P-381	B. Jennings 575 Certificate of Ownership, June 2, 2016	DEEPROOT FUNDS_003009-10	X		
P-382	B. Jennings Welcome Letter, June 6, 2016	DEEPROOT FUNDS_003011	X		
P-383	B. Jennings 575 Application and Subscription Agreement, June 13, 2017	DEEPROOT FUNDS_002996-3003	X		
P-384	B. Jennings 575 Certificate of Ownership, June 13, 2017	DEEPROOT FUNDS_002993-94	X		
P-385	B. Jennings Welcome Letter, June 14, 2017	DEEPROOT FUNDS_002995	X		
P-386	B. Jennings email re: 575p Payment for Sept., Sept. 28, 2020	SEC-DEEPROOT-E-0094714-15	X		
P-387	McClain Application and Subscription Agreement, Oct. 20, 2016	DEEPROOT FUNDS_003916-24	X		
P-388	McClain Certificate of Ownership, Dec. 20, 2016	DEEPROOT FUNDS_003912-13	X		
P-389	McClain Welcome Letter, Dec. 20, 2016	DEEPROOT FUNDS_003915	X		

<sup>14</sup> The SEC plans to substitute three new investors witnesses for three previously identified investor witnesses. Exhibits P-379 though P-389 are new exhibits related to the new investor witnesses.

Dated: April 19, 2024

Respectfully submitted,

/s/ Charlie L. Divine

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**CERTIFICATE OF SERVICE**

I certify that on April 19, 2024, a true and correct copy of this Exhibit List was filed electronically through the Court's CM/ECF system, which will send copies to all counsel of record.

/s/ Charlie L. Divine

Charlie L. Divine

*Counsel for Plaintiff United States Securities  
and Exchange Commission*